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May 22, 2020

VIA ECF

Honorable Mark Falk, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Courtroom PO 09
Newark, NJ 07102

Re: ***Chao Seminars, Inc. v. Downtown Dental Arts of Montclair et al.***
Case No. 20-cv-02567-WJM-MF

Dear Judge Falk:

This firm was recently retained to represent defendants First Mountain Dental Group P.C. (improperly pled as Downtown Dental Arts of Montclair), Konstantinos Trichas, and Ivan Georgiev (collectively, “defendants”) in this matter.

Defendants’ Florida-based counsel in another matter accepted service of the Complaint in this case on April 24, 2020, and was given 30 days to file a responsive pleading, *i.e.* an additional 9 days. Under the Rule 6(a) of the Federal Rules of Civil Procedure, the deadline to respond to the Complaint is May 26, 2020. After filing our appearance in this matter yesterday, we reached out to plaintiff’s counsel of record in this matter, Ben D. Manevitz, Esq., to request a two-week extension of time to answer or otherwise move, as L. Civ. R. 6.1(b) was no longer applicable. We have not received a response from plaintiff’s counsel. Accordingly, defendants respectfully request a two-week extension of time, until **June 9, 2020**, to answer or otherwise move.

We thank the Court for its attention to this matter.

Respectfully,


BRIAN M. BLOCK